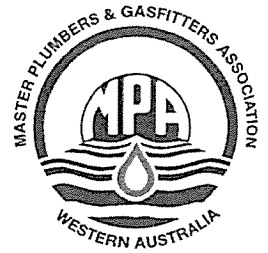


24 July 2015



DIVISION OF MPA GROUP

Mutual Recognition Schemes  
Productivity Commission  
Locked Bag 2  
Collins St East  
MELBOURNE VIC 8003

Registered Union  
of Employers

Head Office  
P 08 9471 6661  
F 08 9471 6663

Level 3, 353 Shepperton Road  
East Victoria Park WA 6101

PO Box 5216  
East Victoria Park WA 6981

ABN 13 804 458 1E7

E mail@mpawa.asn.au  
W www.masterplumbers.asn.au

By email: [mutual.recognition@pc.gov.au](mailto:mutual.recognition@pc.gov.au)

To Whom It May Concern

## RE: MUTUAL RECOGNITION SCHEMES DRAFT REPORT

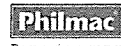
On behalf of the Master Plumbers and Gasfitters Association of WA (MPGA), I thank you for the opportunity to comment on the *Mutual Recognition Schemes Draft Report* published by the Productivity Commission in June 2015.

### Our support for the mutual recognition schemes

MPGA supports the continuation of the mutual recognition schemes for licensing in the plumbing and gasfitting occupations providing the industry benchmark for required competencies is consistent in all jurisdictions.

MPGA supports the view that mutual recognition for plumbers and gasfitters provides:

- Increased opportunities for Australians to work across the country, and for Australians and New Zealanders to work in each other's country.
- Improved cooperation between regulatory authorities.
- Certainty for workers considering moving between jurisdictions.
- Licensing authorities a faster way to consider applications for recognition of equivalent licences.
- Employers with mobile workforces greater ease to relocate workers more quickly across state and territory borders.



### **Applications without a current licence**

One area of concern with the current system is the process for an applicant whose licence in their home state is no longer current, because the requirement to obtain a Certificate of Reciprocity from their home state creates a delay.

MPGA supports the ability for the registration body to conduct background checks, including police clearance declarations.

### **Continual professional development**

MPGA supports in principal the need for ongoing up-skilling of plumbers and gasfitters to keep pace with new technologies.

The continuous innovation in this ever-developing industry, coupled with the demand for increased cost efficiency and environmental protection, mean plumbing and gasfitting practitioners always need to stay up-to-date with new information. In addition, consumers demand solutions that satisfy their needs for improved efficiency from products and technology.

However, at this stage, continuing professional development would be difficult under the mutual recognition schemes and we believe it is better left for further consideration at a later review.

To our knowledge, with the exception of New Zealand, no other state or territory has a compulsory continuing professional development scheme.

### **Automatic mutual recognition**

MPGA does not support the automatic mutual recognition proposal for two reasons.

First, an automatic system would be difficult to administer without the National Occupational Licensing Scheme (NOLS) that was abandoned several months ago.

The second reason is that an automatic system would create concerns about the absence of a requirement to register locally undermining the capacity of regulators to protect consumers. Regulators depend on registration fees to fund enforcement activities; without a formal registration requirement, they will have no knowledge of the people practicing in their jurisdiction.

### **National harmonisation**

MPGA strongly believes apprenticeship training under National Training Package should include progression pathways (for example, Certificate III to Certificate IV) that are consistent with the licensing regimes in all jurisdictions.

In addition, the scope of works for plumbers and gasfitters needs clarity. This will require, for example, a clear definition of what 'plumbing' includes, such as water, sanitary, drainage gas and roofing work. This is what national licensing in its terms of reference was trying to achieve. As this did not occur, the industry needs to create a clear definition now.

## **Migrant entry**

MPGA believes migrant offshore assessment needs refining to ensure that at the offshore point of application for a visa, the assessment is consistent and readily articulates into the existing training packages.

With the correct implementation, the migrant gap training requirement upon arrival in Australia will be very clear to the participant. In addition, once the applicant achieves competency, it will be easier for employers to recognise it and understand how it meets their needs.

Currently there are significant gaps because state jurisdictions have different requirements.

## **Additional options**

The discussion paper also proposed a number of options for consideration including:

- Requiring people to reside in the jurisdiction where they first register for a period of say 12 months before seeking registration elsewhere under mutual recognition.
- Attaching additional requirements on service providers from other jurisdictions to protect public health, security or the environment, on the grounds that registration requirements in the person's origin jurisdiction are inadequate.
- Refusing to recognise the qualifications of an individual who undertakes training in one jurisdiction, registers in another jurisdiction and then seeks to have their registration recognised in the jurisdiction where they trained.

In agreement with the Commission, the MPGA is not convinced that any of these three options are worth pursuing, as they would add to the cost of administering mutual recognition schemes and hinder the cross-border movement of short-term residents who have a genuine reason for moving.

## **Conclusion**

In conclusion, the MPGA supports the continuance of the mutual recognition schemes for the plumbing and gasfitting industry, with continual improvements by regulatory authorities to streamline the process wherever possible.

Should you wish to discuss this matter further, please do not hesitate to contact me.

Yours sincerely

Murray Thomas  
Chief Executive Officer